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State Budget and Control Board
DIVISION OF THE STATE CIO

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May 28, 2004

Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 03-66

Ex Parte Presentation

Dear Chairmen Powell:

As Deputy Chief Information Officer for the State Budget and Control Board, I chair the South Carolina K-12 School Technology Initiative Committee. This committee oversees technology funding provided by the South Carolina Legislature for schools and libraries in the state. ITFS is one of the technologies supported through the committee. South Carolina Educational Television (SCETV) is a member of the committee, and manages ITFS infrastructure for the state. This infrastructure includes 35 sites that provide programming transmission and 835 receive sites, and is the backbone of video service to our Elementary, Middle, and High Schools throughout South Carolina. Each year, SCETV, in cooperation with the South Carolina Department of Education, utilizes the state's 68 licensed ITFS channels to transmit nearly 100,000 instructional and professional development programs to over 450,000 students and 40,000 educators in our K-12 schools.

We understand that a proposal from the Wireless Bureau is being circulated for FCC consideration that would eliminate the eligibility restrictions on ITFS spectrum, and would reduce the amount of spectrum held by each ITFS licensee in order to accommodate new commercial users in the band. If this is the case, we wish to protest

the proposal. The state has made substantial investments to deploy ITFS technology in order to serve schools across the entire state. Any proposal which reduces the state's licensed bandwidth will potentially cause serious disruption in the service to our schools, in addition to potentially causing the state to invest substantial sums for frequency and/or equipment re-design and deployment with no resulting benefits to the state. And because our system is deployed statewide, we are concerned about the potential for interference with others who may be granted the use of the bandwidth that the state may be required to relinquish, since the frequencies are currently reused across the state.

ITFS spectrum was specifically allocated to support formal education, and South Carolina utilizes this spectrum effectively to answer the many challenges facing our mainly rural state. This critical educational asset must be protected. We look forward to the prospect of ITFS technologies transitioning to support a range of new broadband services, but we urge you to reject any proposals that will allow ITFS spectrum to be licensed to commercial entities, or to reduce in any respect the total amount of spectrum allocated to ITFS.

We hope that you will support our efforts to keep this valuable educational resource in the hands of educators. Thank you for your consideration of this important matter.

Sincerely,

Tom Fletcher
Deputy Chief Information Officer

cc: Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Kevin J. Martin
Commissioner Jonathan S. Adelstein